

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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KEITH R. REINHARD and  
STACY REINHARD,

Plaintiffs,

AMERISURE INSURANCE COMPANY  
and DEAN HEALTH PLAN,

Involuntary Plaintiffs,

No. 2:19-cv-01732-LA

vs.

Judge Lynn Adelman

JPW INDUSTRIES INC.; V-BELT  
GLOBAL SUPPLY, LLC; USA  
BEARINGS AND BELTS; QUALITY  
BEARINGS BELTS AND CHAIN; ABC  
INSURANCE CORPORATION; DEF  
CORPORATION; and GHI INSURANCE  
CORPORATION;

Defendants.

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**RULE 26(f) REPORT**

The parties submit this report in advance of the telephonic scheduling conference on March 11, 2020, at 11:45 a.m., pursuant to Fed. R. Civ. P. 26(f), Fed. R. Civ. P. 16(b), and Civil L. R. 16(a) (E.D. Wis.).

1. **Attorneys of record.** The parties are represented by the following attorneys who have participated in the 26(f) conference and will appear at the telephonic scheduling conference:

**Attorney for Keith and Stacy Reinhard**  
Ronald G. Tays  
Tays Law Offices  
812 E State St  
Milwaukee, WI 53202  
414-223-4555

rgt@tayslaw.net

**Attorneys for JPW Industries Inc.**

Joshua D. Lee

Brian O. Watson

Raymond D. Rushing

Riley Safer Holmes & Cancila LLP

70 W Madison St, Ste 2900

Chicago, IL 60602

312-471-8700

jlee@rshc-law.com

rrushing@rshc-law.com

bwatson@rshc-law.com

**Attorney for USA Bearings & Belts**

Michael A. Testolin

The Law Offices of Joseph A. Marcinia

2 N LaSalle, Ste 2510

Chicago, IL 60602

312-384-7618

michael.testolin@thehartford.com

**Attorney for Quality Bearings Belts and Chain**

Paul J. Pytlik

Ratzel Pytlik & Pezze LLC

3330 N Springdale Rd

Brookfield, WI 53045-3594

262-781-1911

ppytlik@ratzel-law.com

**2.     The nature of the case.** The Reinhards filed this case on April 8, 2019,

in the Circuit Court for Milwaukee County, Wisconsin, alleging strict liability and

negligence claims as a result of Mr. Reinhard's injuries during a workplace accident

while operating a powered table saw.

**3.     Any contemplated motions.** Defendants anticipate filing dispositive motions.

4. **The parties' discovery plan.** The parties propose the following discovery plan:

1. If the parties have not already done so, they shall comply with Fed. R. Civ. P. 26(a)(1) concerning initial disclosures.

2. Any amendments to the pleadings shall require either consent of the parties or leave of court consistent with Fed. R. Civ. P. 15.

3. Plaintiffs shall disclose all expert witnesses consistent with Fed. R. Civ. P. 26(a)(2) on or before **July 13, 2020**.

4. Plaintiffs shall offer all expert witnesses for deposition consistent with Fed. R. Civ. P. 26(b)(4) on or before **September 11, 2020**.

5. Defendants shall disclose all expert witnesses consistent with Fed. R. Civ. P. 26(a)(2) on or before **November 11, 2020**.

6. Defendants shall offer all expert witnesses for deposition consistent with Fed. R. Civ. P. 26(b)(4) on or before **January 11, 2021**.

7. All requests for discovery shall be served by a date sufficiently early so that all discovery shall be completed on or before **March 11, 2021**.

8. Any dispositive motions shall be filed on or before **April 12, 2021**.

9. This schedule shall not be modified except upon a showing of good cause and by leave of the court.

5. **Whether the parties anticipate the disclosure or discovery of electronically stored information.** The parties do not anticipate any issues with the disclosure or discovery of electronically stored information.

**6. Whether the parties have reached an agreement for asserting post-production claims of privilege or of protection as trial-preparation material, and whether the parties request the judge to enter an order including the agreement.**

The parties agree that post-production claims of privilege or of protection as trial-preparation material shall be asserted consistent with Fed. R. Civ. P. 26(b)(5).

**7. Whether settlement discussions have occurred.** The parties have not engaged in settlement discussions. The parties believe that settlement discussions will be more meaningful after some discovery has been conducted.

**8. The basis for the Court's subject matter jurisdiction.** The Court's subject matter jurisdiction is based on diversity of citizenship and removal under 28 U.S.C. §§ 1332, 1441, and 1446.

**9. Whether the case is included in one of the categories of proceedings exempted from initial disclosures and discovery conference pursuant to Fed. R. Civ. P. 26(a)(1)(B) and 26(f).** This case is not exempt from initial disclosures and discovery conference.

**10. Such other matters as may affect further scheduling of the case for final disposition.** The parties anticipate a stipulated protective order to govern the treatment of any confidential information or protected health information disclosed during the course of the litigation.

Dated: February 21, 2020

/s/ Ronald Tays

Ronald G. Tays  
Tays Law Offices  
812 E State St  
Milwaukee, WI 53202  
414-223-4555  
rgt@tayslaw.net  
*Attorney for Keith and Stacy Reinhard*

Respectfully submitted,

/s/ Joshua Lee

Joshua D. Lee  
Raymond Rushing  
Brian O. Watson  
Riley Safer Holmes & Cancila LLP  
70 West Madison, Suite 2900  
Chicago, Illinois 60602  
Telephone: (312) 471-8700  
Facsimile: (312) 471-8701  
jlee@rshc-law.com  
rrushing@rshc-law.com  
bwatson@rshc-law.com  
*Attorneys for JPW Industries Inc.*

/s/ Michael Testolin

Michael A. Testolin  
The Law Offices of Joseph A. Marciniak  
2 N LaSalle, Ste 2510  
Chicago, IL 60602  
312-384-7618  
michael.testolin@thehartford.com  
*Attorney for USA Bearings & Belts*

/s/ Paul Pytlik

Paul J. Pytlik  
Ratzel Pytlik & Pezze LLC  
3330 N Springdale Rd  
Brookfield, WI 53045-3594  
262-781-1911  
ppytlik@ratzel-law.com  
*Attorney for Quality Bearings Belts and Chain*

**CERTIFICATE OF SERVICE**

The undersigned attorney certifies on February 21, 2020, these papers were electronically filed using the CM/ECF system, which will send notice of this filing to all counsel of record.

*/s/ Raymond Rushing*